

## REMARKS

Applicant requests favorable reconsideration and allowance of the subject application based on the following remarks. Claims 1-60 remain pending in the present application and are for reconsideration. No new matter has been introduced by this response.

Applicant's response and remarks after Final are appropriate under 37 C.F.R. §1.116 because they address the Office's remarks in the Final Action, and thus could not have been presented earlier. In addition, the remarks should be entered to place the application in better form for appeal.

### *Claims 25, 33, and 38: Examiner's Burden Not Met (No Stated Reasons for Rejection)*

The Office fails to present evidence or arguments to support rejection of Claims 25, 33, and 38. Applicant had requested that the Office provide guidance for these claims or, otherwise, indicate that these claims are allowable (dated 8/29/06). However, the Office did not provide any guidance or indicate allowability of Claims 25, 33, and 38. Consequently, Applicant reiterates its request (see, e.g., MPEP §2142 "The examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness").

### *35 U.S.C. § 103 Rejections*

A. **Claims 1, 5, 6, 9, 10, 15-17, 19-21, 23, 26, 29, 32, 36, 41, 42, 45-50, 52, 55, 56, 59, and 60 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,674,372 to Ouyang (hereinafter, "Ouyang") in view of U.S. Patent No.**

6,009,444 to Chen (hereinafter, “Chen1”) further in view of U.S. Patent No. 6,005,495 to Connolly et al (hereinafter “Connolly”).

**B. Claims 2, 7, 18, 22, 24, 30, and 57 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,674,372 to Ouyang in view of U.S. Patent No. 6,009,444 to Chen (hereinafter, “Chen1”), U.S. Patent No. 6,005,495 to Connolly et al (hereinafter “Connolly”), further in view of U.S. Patent No. 6,073,146 to Chen (hereinafter, “Chen2”);**

**C. Claims 3, 4, 31, 32, 37, 39, 40, 53, and 54 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,674,372 to Ouyang in view of U.S. Patent No. 6,009,444 to Chen1, U.S. Patent No. 6,005,495 to Connolly, further in view of U.S. Patent No. 6,489,950 Griffin et al. (hereinafter “Griffin”);**

**D. Claims 8, 28, and 58 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,674,372 to Ouyang in view of U.S. Patent No. 6,009,444 to Chen1, U.S. Patent No. 6,005,495 to Connolly, further in view of U.S. Patent No. 6,292,772 Kantrowitz et al. (hereinafter “Kantrowitz”);**

**E. Claims 11-13, 34, 35, 43, and 44 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,674,372 to Ouyang in view of U.S. Patent No. 6,009,444 to Chen1, U.S. Patent No. 6,005,495 to Connolly, further in view of U.S. Patent No. 6,272,464 to Kiarz et al. (hereinafter “Kiarz”); and**

**F. Claims 14, 27, and 51 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,674,372 to Ouyang in view of U.S. Patent No.**

6,009,444 to Chen1, U.S. Patent No. 6,005,495 to Connolly, further in view of U.S. Patent No. 5,838,972 to Matsuzuka et al. (hereinafter "Matsuzuka"). Applicant respectfully traverses the rejections.

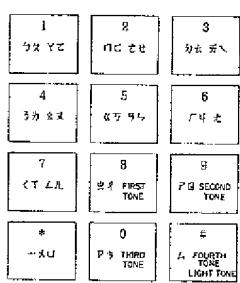
To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations (see, MPEP §2142).

**Independent Claims 1, 17, 21, 24, 27, 29, 37, 45, 47, 49, 51, and 52** recite, in part:

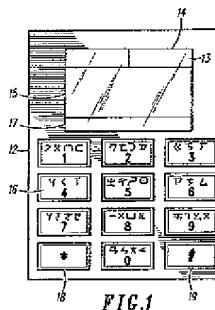
*"an input string representative of one or more Chinese phonetic characters, wherein the keypad comprises number keys, the number keys having associated letters of an alphabet;*

Applicant agrees with the Office's assessment in several previous office actions that Ouyang and Chen1 do not disclose, teach or suggest "the number key having associated letters" (Office Action, 11/15/06, pg 3). The cited figures from Ouyang and Chen1 are reproduced below for convenience:

Ouyang, Figure 2:



Chen1, Figure 1:



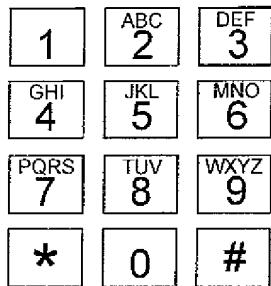
References Fail to Teach or Suggest Input of Chinese Phonetic Characters

First, Applicant asserts Connolly fails to compensate for the deficiencies of Ouyang and Chen1, as Connolly does not disclose, teach, or suggest “*a keypad to receive an input string representative of one or more Chinese phonetic characters, wherein the keypad comprises number keys, the number keys having associated letters of an alphabet*”.

Connolly describes a numeric keypad for text entry on a telephone touch-tone (col. 1, lines 6-8). Connolly states that the user may type words, sentences or enter arbitrary text (col. 2, lines 54-61) based on word derivations of the English language (col. 9, lines 49-53). The claim recites “*a keypad to receive an input string representative of one or more Chinese phonetic characters*”. Thus, Connolly teaches entry of word derivations of the English language while the claim recites entry of Chinese phonetic characters.

The cited figure from Connolly is reproduced below:

Connolly, Figure 2:



The evidence indicates that Ouyang, Chen1, and Connolly, alone or in combination, do not teach or suggest “*a keypad to receive an input string representative of one or more Chinese phonetic characters, wherein the keypad comprises number keys, the number keys having associated letters of an alphabet*”. More specifically, Applicant submits that the

evidence relied upon by the Office does not support the rejections made under 35 U.S.C. §103(a).

#### Modification Renders Primary Reference Unsatisfactory for Intended Purpose

Second, the MPEP states “if proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification” (MPEP §2143.01 V.) For example, using Connolly’s letters of the alphabet on a keypad into the systems of Ouyang and Chen1 would render them unsatisfactory for their intended purpose, inputting Chinese characters based on the phonetic symbols of the Chinese language on the keypad. On the contrary, there would not be any Chinese characters shown on the input keys. Furthermore, in Claim 1, inputting keys with numbers having associated alphabet letters uses a language system to automatically select the most probable language character based on the alphabet input. The systems presented in Ouyang and Chen1 lack this feature, so the combination would render them inoperable. Thus, the evidence is insufficient to support a *prima facie* obvious rejection of the claims.

#### Even if Modification Did Not Render Unsatisfactory, Evidence Insufficient

Third, to establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings (MPEP §2142). The motivation provided by the Office to “provide user an improved method for entering characters on numeric keypad” is not well reasoned (Office Action,

page 3). Ouyang and Chen1 input Chinese characters using the phonetic symbols on the keypad. Applicant does not understand the rationale how using letters of the alphabet from Connolly to enter Chinese characters would provide an improved method for Ouyang and Chen1. While Connolly describes an alphabet, there is no suggestion or motivation, other than Applicant's disclosure, to employ the alphabet to represent Chinese phonetic characters. The Office cannot improperly rely on hindsight without evidence of teaching or suggestion to propose the suggested combination. Thus, this rejection is improper.

Fourth, the Office is inconsistent by stating motivation is found in the Chen1 reference and in the knowledge generally available in the art, i.e., keypad comprises number keys having associated letter of alphabet (Office Action, page 10). The evidence contradicts Chen1 stating "no special key needs to be activated to signify selection of the desired symbol from key 1. This feature makes operation of the device faster and more intuitive" (col. 3, lines 34-36). On the contrary, there would not be a need to modify Chen1 with the number keys having associated letter of alphabet. Applicant asserts the Office fails to provide evidence sufficient to establish motivation for one of ordinary skill in the art to modify Ouyang, Chen1, and Connolly. Applicant respectfully requests that the §103 rejection be withdrawn.

#### Additional Considerations

##### *1. Phonetic Characters are Pinyin and language characters are Chinese Hanzi*

Ouyang, Chen1, and Connolly do not teach or suggest the claimed "phonetic characters are Chinese Pinyin and the language characters are Chinese Hanzi". The Office fails to cite any portions of Ouyang, Chen1, or Connolly, because the references do not

disclose, teach or suggest these features. Ouyang merely mentions phonetic symbols of the Chinese language (Abstract). Chen1 describes entering Zhuyin phonetic symbols, not Pinyin (col. 1, lines 5-7; col. 2, lines 10-37). Connolly is directed towards entering characters on a numeric keypad for a telephone touch-tone keypad, which is not directed towards Chinese phonetic characters or language characters.

Chen2 fails to compensate for the deficiencies of these references. The Office has failed to establish a motivation sufficient for one of ordinary skill in the art to combine the references. The motivation provided by the Office “to provide the teaching of Chen2 into the systems of Ouyang, Chen1, and Connolly in order to process phonetic Chinese text and Hanzi” is very general. Thus, this rejection is improper. Applicant respectfully requests that the §103 rejection be withdrawn.

## 2. *Direct Key-Based Search Engine*

In addition, Ouyang or Chen1 do not teach or suggest the claimed “direct key-based search engine”. The Office fails to cite any portion of Ouyang or Chen1, which teach this feature. Chen1 describes how the user enters the Chinese phonetic symbol as input, user presses a key for completion of character entry, and then the user may select a language character (col. 3, lines 50-51, col. 4, lines 3-9), which is not a direct key-based search engine. For this reason alone, the Office has failed to present a *prima facie* case of obviousness with respect to Claims 17 and 45. Accordingly, Applicant requests that the §103 rejections be withdrawn.

### 3. *Converting*

The Office argues that it would have been obvious to one of ordinary skill to provide the teaching of Chen2 into the system of Ouyang and Chen1 to speed up the language conversion process. Applicant respectfully disagrees. A person of ordinary skill in the art would not have combined these references, as there is no motivation to combine Ouyang and Chen1 with Chen2, which are entirely different systems. Ouyang and Chen1 are directed to devices with a numeric keypad with the challenges of entering Chinese characters with a limited number of keys (Ouyang, Figure 2 and Chen1, Figure 1). In contrast, Chen2 describes a personal computer with a full-size QWERTY keyboard and monitor (Chen2, Figure 2A). Input of Chinese characters using a limited keypad (such as those found on cellphones and PDAs) poses entirely different issues, with unique considerations, in comparison to input of Chinese characters using a full-size QWERTY keyboard. A person of ordinary skill in the art faced with inputting Chinese characters using a numeric keypad would not have been compelled or motivated to consider Chen2's computer system with full-size keyboard. Thus, the cited combination of these references fails to teach or suggest all of the features of Claims 9, 29, and 49.

### 4. *Remote Server*

Finally, Applicant asserts Ouyang and Chen1 fail to disclose, teach, or suggest "server remote", as recited in Claims 14, 27, and 51.

The Office fails to particularly point out where any of these features are taught or suggested by the cited combination. The Office has failed to present any line of reasoning as to why the cited combination teaches these different features. As a result, the Office has

failed to present a *prima facie* case of obviousness with respect to Claims 14, 27, and 51. For this reason alone, the 35 USC §103(a) rejection of these claims is improper and should be withdrawn.

**Independent Claims 17, 21, 24, 27, 29, 37, 45, 47, 49, 51, and 52** recite alphabet keypad features similar to those of Claim 1, discussed above and is, therefore, allowable for at least substantially the same reasons as Claim 1.

**Dependent claims 2-16, 18-20, 22, 23, 26, 28, 30-32, 35, 36, 40-44, 46, 48, 50, and 53-60** depend from one of independent Claims 1, 17, 21, 24, 27, 29, 37, 45, 47, 49, and 52 and are allowable by virtue of this dependency. These claims are also allowable for their own recited features that, in combination with those recited in claim 1, are not disclosed, taught, or suggested by Ouyang or Chen1.

Applicant respectfully submits that the cited references do not render the claimed subject matter obvious and that therefore the claimed subject matter does patentably distinguish over the cited references. Further, various evidence of record supports non-obviousness of the subject matter of Claims 1-60. For these reasons, the 35 USC §103(a) rejection of these claims is improper and should be withdrawn.

**Conclusion**

Claims 1-60 are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of the subject application. If any issue remains unresolved that would prevent allowance of this case, the Examiner is requested to contact the undersigned attorney to resolve the issue.

Respectfully Submitted,

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